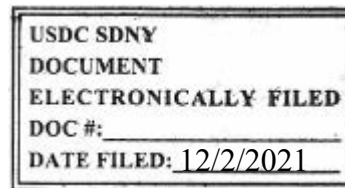


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November 30, 2021

VIA ECF

The Honorable Alison J. Nathan
United States District Judge
United States District Court – S.D.N.Y.
40 Foley Square, Room 906
New York, New York 10007

**Re: City of Almaty, Kazakhstan, et ano. v. Mukhtar Ablyazov, et al.,
No. 1:15-cv-05345 (AJN) (KHP)**

Dear Judge Nathan:

We represent Triadou SPV S.A. (“Triadou”) in the above-referenced case and write jointly with BTA Bank JSC to respectfully request relief from two deadlines recently set by the Court concerning the parties’ submission of motions *in limine*, presently due on December 3, 2021, [ECF No. 1460], and proposed jury charges, voir dire questions, and verdict forms, presently due on December 10, 2021, [ECF No. 1464]. Specifically, the parties request that the Court adjourn both deadlines in light of the Court’s November 5, 2021 Order *sua sponte* adjourning the deadline to file the Joint Pretrial Report pending clarity about the trial schedule. [ECF No. 1464].¹ This will allow the parties to avoid the inefficiencies of submitting ancillary filings *before* filing the Joint Pretrial Report with the Court.

The parties propose instead to submit a new schedule (i) for filing motions *in limine* and proposed jury charges after the Court sets a deadline for the submission of the Joint Pretrial Report, or, alternatively, (ii) that includes these items as well as a deadline to submit the Joint Pretrial Report, in the event that trial will not go forward on February 7, 2022, [see ECF No. 1460 at 2]. The parties can use the additional time to continue to work through disputes germane to these materials.

Thank you for your consideration of this request.

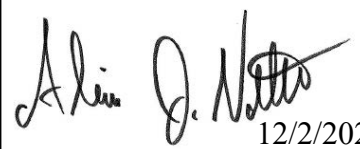
The deadlines for filing motions in limine and the proposed jury charge are hereby adjourned.

SO ORDERED.

Respectfully submitted,

/s/ Deborah A. Skakel
Deborah A. Skakel

¹ The Court’s November 5, 2021 Order suggested that it might have more information about a firm trial date after the Clerk’s Office. [ECF No. 1464]. The parties would welcome any information in that regard. In particular, although Plaintiff is ready, willing, and able to proceed, the principal trial counsel (Mr. Schwartz) is scheduled to conduct a two-week trial before Judge Engelmayer beginning on January 24, 2022, which the Court has indicated is a firm date. See *United States v. Sadleir*, No. 20 Cr. 320 (PAE). Conducting the two trials back-to-back, if that occurs, will require advanced planning.


12/2/2021
SO ORDERED.
ALISON J. NATHAN, U.S.D.J.